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**SITE-WIDE QUALITY ASSURANCE PROJECT  
PLAN**

**USEPA/DOE-FN**

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LETTER**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

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FEB 12 1993

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REPLY TO THE ATTENTION OF:

HRE-8J

Mr. Jack R. Craig  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

RE: Site-Wide Quality  
Assurance Project Plan

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) December 9, 1992, Response to Comments on the Site-Wide Quality Assurance Project Plan (SCQ); January 29, 1993, Change Pages for the SCQ; and the February 3, 1993, Implementation of Analytical Methods in the SCQ. These documents were submitted in response to discussions between U.S. EPA and U.S. DOE regarding the SCQ on November 18, 1992, January 21, 1993, and January 28, 1993.

On August 28, 1992, U.S. EPA conditionally approved the SCQ pending resolution of issues regarding chain-of-custody and data validation. As a result of the above discussions, and specifically U.S. DOE's January 29, 1993, submittal, U.S. EPA approves the revisions. These revised pages should be attached to all copies of the SCQ.

During the above discussions, U.S. DOE reported significant problems with various laboratories being able to implement the analytical methods described in the SCQ. U.S. EPA had previously reviewed the analytical procedures with the understanding that these procedures were developed so that the laboratories involved were capable of performing these analyses. U.S. EPA considers the inability of laboratories to implement the analytical procedures in the SCQ a significant issue that must be resolved in a timely manner.

Therefore, U.S. EPA will not approve the SCQ until the analytical procedure issue is resolved. U.S. DOE must submit revised analytical procedures, detailing documentation as required in the attached comments, within (30) thirty days receipt of this letter. U.S. EPA also requests a meeting to discuss this issue at your earliest convenience.

(re junk)  
action response  
to doe-0483-9-(5605)  
action response to  
doe-0998-93 (5606) +  
doe-1017-93 (5627)

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Please contact me at (312/FTS) 886-0992 if you have any questions.

Sincerely,



James A. Saric  
Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO  
Pat Whitfield, U.S. DOE-HDQ  
Nick Kaufman, FERMCO  
Jim Theising, FERMCO  
Paul Clay, FERMCO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

4127

REPLY TO THE ATTENTION OF:

MEMORANDUM

SQ-14J

DATE: **FEB 08 1993**

SUBJECT: Review of U.S. Department of Energy Revised Pages and Responses to the January 28, 1993 Teleconference for the Quality Assurance Project Plan (QAPjP) for Fernald Environmental Management Project (Fernald, Ohio) Superfund Site

FROM: George C. Schupp, Chief  
Quality Assurance Section

TO: Kevin Pierard, Chief  
Ohio/MN Technical Enforcement Section  
RCRA Enforcement Branch

ATTENTION: James Saric

The Quality Assurance Section (QAS) has completed its review of the subject U.S. D.O.E. responses dated January 29, 1993 and February 3, 1993 (QAS SF Log-In # 1866) received on February 3, 1993.

The revised pages presented in the January 29th submission satisfactorily address the chain-of-custody concerns discussed in my memorandum dated December 18, 1992. The revised pages should be attached to all copies of the QAPjP.

The changes in analytical procedures as discussed between James Saric and Kevin Bolger of our staffs do pose significant problems in the approval of the QAPjP. The USEPA Region 5 (QAS and Air & Radiation Division) has, in good faith, reviewed the chemical and radiochemical procedures previously submitted by the U.S. D.O.E. It was the Region's understanding that these procedures were developed such that the laboratories involved in the project were capable of performing these analyses. These analyses would be the basis of "Statements of Work" for the significant amount of analytical work required for the Fernald project.

The February 3rd submission takes a number of steps backward for the project. The document presents two example tables to indicate how SW-846 procedures would be implemented by the project's laboratories. These tables do not specify which options, sample preparations, calibration (initial/continuing)

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concentrations, surrogate concentrations, QC limits, detection/reporting limits (or how verified), etc. other than citation of "method". The document also indicates that " due to the lack of industry standards for radiochemical analyses, labs will be able to use any available method". This goes against the commitment that the U.S. D.O.E. was going to establish standards which all labs would need in order to work on the Fernald project.

Unless the U.S. D.O.E. can provide more detailed requirements for each analysis proposed for the Fernald project, there will be difficulty in ensuring data comparability among labs performing the same or complementary analyses. The negative impact of this will be most evident during the data validation and data assessment stages of the project for each site as well as the overall sitewide remedial activities.

My staff is available to discuss this further with you, the U.S. D.O.E. and its contractors. Feel free to contact me or Kevin Bolger of my staff (3-7712).

cc: K. Khanna, TSU  
C. Elly, CRL